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**REMARKS**

Claims 1, 2, 4-15 and 17-20 are currently pending in the subject application and are presently under consideration. A listing of the claims is at pages 2-5. Claims 1, 8 and 15 have been amended. Claim 17 has been canceled.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**I. Rejection of Claims 15 and 17-20 Under 35 U.S.C. §112, first paragraph**

Claims 15 and 17-20 stand rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. The Examiner states that the claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the art that the inventor(s) had possession of the claimed invention. Claim 15 has been amended to correct any deficiencies related to this rejection. As such, this rejection should be withdrawn.

**II. Rejection of Claims 1, 2 and 4-14 Under 35 U.S.C. §103(a)**

Claims 1, 2 and 4-14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Galipeau *et al.* (US Pat. No. 6,249,913 B1) in view of Garney *et al.* (US Pat. No. 5,890,015). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Galipeau *et al.* and Garney *et al.*, individually or in combination, do not teach or suggest each and every element as set forth in the subject claims.

To reject claims in an application under §103, an examiner must show an un rebutted *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both

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be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicant's claimed invention relates to an integrated communication system for distributing integrated, and combined or reformatted audio/video and other signals over aircraft telecommunications wiring. More particularly, independent claim 1 recites an integrated communication system for an aircraft having at least one passenger seat, comprising *an integrated signal unit operable to receive and transmit a plurality of signals of disparate nature to and from a user of the at least one passenger seat in the aircraft, the integrated signal unit reformats the plurality of signals into reformatted information, and transmits the reformatted information to the passenger seat, ...; a plurality of aircraft communication links interfaced with the integrated signal unit for carrying the reformatted information throughout the aircraft from sources of the reformatted information...; and a receiving device interfaced to the at least one passenger seat....* Galipeau *et al.* does not expressly or inherently disclose the aforementioned novel aspects of applicant's invention as recited in the subject claims.

Galipeau *et al.* teaches an aircraft data management system that provides a passenger seated on the aircraft with a number of entertainment and productivity enhancing options. Such options include video, audio, internet, airplane systems data and power. Located proximate to each seat group is an integrated seat box that includes a network interface card that identifies a requesting passenger for proper directing of the required data and/or power from devices that interface with a network controller back to the requesting passenger. Accordingly, a seat-to-seat cable is disclosed that delivers both power and data to integrated seat boxes from a plurality of data sources and at least one power source. The seat-to-seat cable contains both data communication lines and power supply lines and transmits data and power from data sources and power sources to selected identifiable seats by way of the network controller. (See Col. 4, lines 21-31). Whereas the present invention, utilizes communication links interfaced to an aircraft bus which forwards the various signals from their respective signal generating devices at other places in the aircraft to the integrated signal unit. An integrated signal unit then reformats and integrates all of the signals and forwards them on through a set of wireline

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or wireless links to the various physical apparatus or devices in the seat. For example, a telephone receiver, an audio/video monitor, or a radio or music speaker may be interfaced in a passenger seat. Thus, the present invention utilizes an integrated signal unit that combines together data (reformatted audio/video/other signals) and other information and sends this reformatted information over telecommunication-type wiring, eliminating the need for separate audio and telecommunications wiring. Galipeau *et al.* directs data and/or power from devices that interface with a network controller back to the requesting passenger but does not reformat audio (or other data) and pass it as telecommunications data on unused channels or existing telecommunication wiring such that separate audio and telecommunications wiring is not necessary. Accordingly, Galipeau *et al.* is silent regarding an integrated communication system for an aircraft, wherein ***an integrated signal unit reformats the plurality of signals into reformatted information, and transmits the reformatted information to the passenger seat.***

Garney *et al.* does not make up for the aforementioned deficiencies of Galipeau *et al.* with respect to independent claim 1 (which claims 2 and 4-7 depend there from). Garney *et al.* relates to an apparatus and method for configuring a wireless module onto a Universal Serial Bus (USB) system for attaching USB devices. A hub is coupled to a first host controller. The first host controller interfaces with a second hub connected to a second host controller inside a USB host. The first host controller communicates with the host via a wireless communication system. (See col. 1, line 66-col. 2, line 18). As such, Garney *et al.* is silent regarding ***an integrated signal unit that reformats a plurality of signals into reformatted information, and transmits the reformatted information to the passenger seat.***

With respect to independent claim 8, the seat unit of the aircraft communications system includes “...***a first audio processing circuit operable to generate audio signals, wherein the seat unit reformats the audio signals into reformatted audio information, and transmits the reformatted audio information to the passenger seat; ...and a first telephone signal processing circuit operable to receive and send telephone signals, wherein the seat unit reformats the telephone signals into reformatted telephone information, and transmits the reformatted telephone information to the passenger seat...***” As stated *supra*, Galipeau *et al.* does not reformat audio (or other data) and pass

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it as telecommunications data on unused channels or existing telecommunication wiring such that separate audio and telecommunications wiring is not necessary, as disclosed in the subject claims. Further, Garney *et al.* does not make up for the aforementioned deficiencies of Galipeau *et al.* Garney *et al.* discloses an apparatus and method for configuring a wireless module onto a USB system for attaching USB devices. Thus, Applicant's representative respectfully requests that the rejection for this claim be withdrawn, and for claims 9-14 that depend there from.

In view of the aforementioned deficiencies of the cited art, it is respectfully submitted that this rejection be withdrawn with respect to independent claims 1 and 8 (and claims 2, 4-7 and 9-14 which depend respectively there from).

### **III. Rejection of Claims 15 and 17-20 Under 35 U.S.C. §103(a)**

Claims 15 and 17-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Scott *et al.* (US Pat. No. 5,790,787) in view of The IBM Technical Disclosure Bulletin (hereinafter the "IBM-TDB"). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Scott *et al.* and IBM-TDB, individually or in combination, do not teach or suggest each and every element as set forth in the subject claims.

As stated *supra*, applicant's claimed invention relates to an integrated communication system for distributing integrated, and combined or reformatted audio/video and other signals over aircraft telecommunications wiring. More particularly, independent claim 15 recites a communication system for an aircraft, comprising *an integrated signal unit that communicates a plurality of disparate signals of an aircraft bus to and from a passenger seat, ..., wherein the signal unit reformats at least one of audio signals and video signals into reformatted information, and transmits the reformatted information to the passenger seat; and a receiving system interfaced to the passenger seat and in communication with the signal unit....* Scott *et al.* does not expressly or inherently disclose the aforementioned novel aspects of applicant's invention as recited in the subject claims.

Scott *et al.* teaches a device for interfacing a CD-ROM player to an information network. Each user station includes a display device, headphones, and circuitry for

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interfacing with the network. By operating the CD-ROM player, a user at a user station can execute software, or play video or audio, stored on a CD-ROM disk. Typically, large volumes of data are transferred within each user station, from the CD-ROM disk to the display device, during execution of interactive application software, but little or no data is transferred over the network to or from each user station. Thus, the network can have a simple, inexpensive, low bandwidth implementation. (See col. 2, lines 6-27). Whereas the present invention, utilizes an integrated signal unit that reformats and integrates all of the signals from the signal sources and forwards them on through a set of wireline or wireless links to the various physical apparatus or devices in the seat. Thus, the present invention utilizes an integrated signal unit that combines together data (reformatted audio/video/other signals) and other information and sends this reformatted information over telecommunication-type wiring. Scott *et al.* teaches interfacing a CD-ROM player to an information and/or entertainment network. Accordingly, Scott *et al.* is silent regarding a communication system for an aircraft, ***wherein an integrated signal unit reformats at least one of audio signals and video signals into reformatted information, and transmits the reformatted information to the passenger seat.***

IBM-TDB does not make up for the aforementioned deficiencies of Scott *et al.* with respect to independent claim 15 (which claims 17-20 respectively depend there from). IBM-TDB discusses Wireless-LAN's (Local Area Networks) "WLAN" and how they were developed to provide a simple, inexpensive way to connect digital devices together. (See pg. 1). As such, IBM-TDB is silent regarding ***an integrated signal unit that reformats at least one of audio signals and video signals into reformatted information, and transmits the reformatted information to the passenger seat.***

In view of the aforementioned deficiencies of the cited art, it is respectfully submitted that this rejection be withdrawn with respect to independent claim 15 (and claims 17-20 which depend there from).

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CONCLUSION

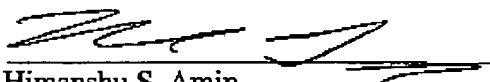
The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [CINGP113USA].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

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